

EXHIBIT 1

11/13/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
Highly Confidential

Michael Patrick Clark 30(b)(6), Vol I & Vol II

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)	
)	
Individual and Representative)	Lead Case No.
Plaintiffs,)	
)	3:23-cv-03417-VC
v.)	
)	
Meta Platforms, Inc.,)	
)	
Defendant.)	
)	

** H I G H L Y C O N F I D E N T I A L **

30(b)(6) VIDEOTAPED DEPOSITION OF
META PLATFORMS, INC.

BY: MICHAEL PATRICK CLARK

Denver, Colorado

VOLUMES I AND II

Wednesday, November 13, 2024

Thursday, November 14, 2024

Reported stenographically by:

Michelle Kirkpatrick, RDR-CRR-CRC-CRI, FCRR

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11/13/2024

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1 PURSUANT TO WRITTEN NOTICE AND FED. R.
2 CIV. P. 30(b)(6) TO META PLATFORMS, INC., & 30(b)(1)
3 TO MICHAEL CLARK, the 30(b)(6) videotaped deposition
4 of META PLATFORMS, INC., BY: MICHAEL PATRICK CLARK,
5 called by the Plaintiffs, was taken commencing at
6 7:12 p.m. on Wednesday, November 13, 2024, and
7 continued to Thursday, November 14, 2024, at
8 1144 15th Street, Suite 2300, Denver, Colorado
9 80202, before Michelle Kirkpatrick, RDR-CRR-CRC-CRI,
10 FCRR, Registered Diplomate Reporter and Federal
11 Certified Realtime Reporter.

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19 Also Present: NIKKI VO, ESQ.

20 Meta In-house Counsel

21 SCOTT HATCH, CLVS

22 Videographer

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1 were being used for that processing.

2 BY MS. POUEYMIROU:

3 Q Do you have an idea of the time period in
4 which -- do you have any idea of a time period when
5 Books3 would be going through the data approval
6 process for Llama 2, which I believe launched in
7 July of 2023?

8 A As I stated, Llama -- or Books3 was part
9 of Llama 1, and that approval was used -- inherited
10 in its use in Llama 2.

11 Q Oh. So it didn't go through --

12 A It didn't go through a new approval --

13 Q I see.

14 A -- but the mitigations were given for the
15 data pipelines to the engineers that were working on
16 them.

17 Q Okay. And then for Llama 3 -- because
18 I've seen old sets -- and we're going to look at
19 one -- going through a reapproval, a 3P dataset
20 approval, sent to you, in fact, for Llama 3.

21 Did Books3 go through another -- go
22 through a reapproval process? Or is it just that it

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1 inherited it?

2 A So between the transition from Llama being
3 built in FAIR to Llama being built in the
4 Generative AI organization, that is when the gen AI
5 private group was built in Privacy, which is where
6 the data review process occurred.

7 That process remained the same through
8 part of the beginning of Llama 3, which would have
9 been the summer of '23.

10 Q Uh-huh.

11 A Or beginning, actually, in the spring
12 of '23.

13 Q February of '23.

14 A There's --

15 Q It's okay. Yeah.

16 A Spring of 2023.

17 Q Okay.

18 A That process, using the tracker that was
19 in a spreadsheet, remained the same through until
20 about November of 2023, where a person that was
21 formally part of privacy review, Sara Chugh, took
22 over dataset reviews and started tracking them in

1 new ways.

2 Sara did that through spring of '24, when
3 another individual, Brooks Cutter, took over that
4 process.

5 At that point, the dataset review process
6 went from the tracker into a tool called AIDC.

7 Where there was documentation of the
8 review that was -- that was done by counsel, that
9 was moved over. And where there weren't, or where
10 it was in the tracker where it was an intermediary
11 spot, had gone through-- well, Sara had it --some of
12 those went into the LaMa tool. Some of those got
13 reviewed so that there was a record of mitigation
14 and the decision.

15 And so there is a -- there is a mix. And
16 so if you have something for me to look at, I would
17 be happy to look at that and --

18 Q Okay. I know we have two minutes, but I
19 just want to make sure I understand.

20 So Books3 for Llama 1 goes through an SRT
21 process.

22 A That is correct.

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1 custody of Ms. Hartnett.

2 MR. BYRD: Yeah.

3 MS. HARTNETT: Yes.

4 (Clark 30(b)(6) deposition adjourned at
5 1:05 p.m.)

6 (Clark 30(b)(6) Deposition Exhibits 613
7 through 618 not attached to this transcript and are
8 in the custody of Ms. Harnett per agreement of
9 counsel.)

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1 STENOGRAPHIC REPORTER'S CERTIFICATE

2 I, Michelle Kirkpatrick, a Registered
3 Diplomat Reporter, Federal Certified Realtime
4 Reporter, do hereby certify that previous to the
5 commencement of the examination, the deponent was duly
6 sworn by me to testify to the truth.

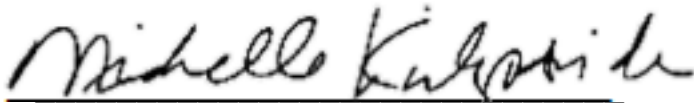
7 I further certify that this deposition
8 was taken in shorthand by me at the time and place
9 herein set forth and was thereafter reduced to
10 typewritten form, and the foregoing constitutes a true
11 and correct transcript.

12 I further certify that I am not related
13 to, employed by, nor of counsel for any of the parties
14 or attorneys herein nor otherwise interested in the
15 outcome of this action.

16 IN WITNESS WHEREOF, I have hereunto set
17 my hand this 18th day of November, 2024.

18

19



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MICHELLE KIRKPATRICK

RDR-CRR-CRC-CRI, FCRR

21

Registered Diplomat Reporter

22

Federal Certified Realtime Reporter